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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON, PORTLAND DIVISION**

ANGELA TORRES, an individual,

Plaintiff,

v.

ALIREZA ZAMANIZADEH, a/k/a ALI  
ZAMANI, an individual, and ADULT CARE  
SEARCH, a foreign non-profit corporation,

Defendants.

Case no.: 3:17-CV-01270-AC

**PLAINTIFF'S STATUS AND ADR REPORT**

In advance of the 11am August 2nd, 2018 in-person status and scheduling conference, plaintiff Angela Torres (Plaintiff) submits this Status and ADR report:

Pursuant to LR 16-4(d), Plaintiff will bring a *draft* proposed Joint Alternative Dispute Resolution Report to the conference. Due to Plaintiff's counsel being away from the office, the parties have not yet conferred on the content or filing of the form report. However, the parties conducted extensive settlement discussions and were negotiating the final terms of a settlement agreement up until about one month ago.

1 Negotiations to resolve this case ended when Plaintiff's contemporaneous negotiations with  
2 adverse parties claiming right to Plaintiff's Bend property – quitclaimed to defendant Adult Care  
3 Search (ACS) by defendant Ali Zamani (Zamani), then mortgaged by ACS – ended and those  
4 third parties resumed and completed a nonjudicial foreclosure of the Bend property. Plaintiff  
5 filed a quiet title action in Deschutes County and is in the process of seeking a temporary  
6 restraining order (TRO) and preliminary injunction to prevent the third parties from taking  
7 possession, encumbering, or selling the Bend property pending resolution of the quiet title action.  
8 Plaintiff could not add those parties to this action without destroying diversity jurisdiction and,  
9 based upon short notice provided by the third parties, could not amend the complaint in time to  
10 seek a TRO.

11 Plaintiff stepped back from negotiating settlement of this case when she could not  
12 negotiate a global resolution, due to the potential for changing facts, issues, and damages and the  
13 potential for prejudice or estoppel between the cases if one were settled while the other  
14 continued. If Plaintiff prevails in the Deschutes County matter, those issues should be entirely  
15 resolved as to the third party claimants and this case-in-chief, as to these parties, can proceed in a  
16 more economical and efficient manner. Plaintiff remains interested in negotiating settlement but  
17 requests time to resolve the Bend property dispute before negotiating settlement with these  
18 current defendants and third party ACareOption.com, Inc.

19 Plaintiff intends to propose abatement of this case, or resetting the time lines, to allow  
20 resolution of the Bend case and, if necessary, addition of ACareOption.com, Inc. or other new  
21 defendants and amendment of the complaint in this action to reflect the broader set of facts and  
22 issues Plaintiff continues to discover. Defendants should not be harmed by this postponement as  
23 they have represented there are minimal funds in the accounts subject to the preliminary  
24

1 injunction in this case. Defendants also should not be entitled to a speedy resolution as the cause  
2 of these separate issues and because they have not responded to Plaintiff's discovery requests.

3 DATED August 1<sup>st</sup>, 2018

**PDX LAW GROUP PC**

4 /s David Richardson

5 David Richardson, OSB 051370

david@pdxlawgroup.com

6 Attorneys for Plaintiff

7 *Served upon defendants by email and U.S.P.S. first class mail, on August 1<sup>st</sup>, 2018, to: Ali*  
8 *Zamani, 613 SW Elderbrook Place, Portland, OR 97225.*